

1 KENNETH W. BROTHERS (*Pro Hac Vice*)
brothersk@dicksteinshapiro.com

2 GARY M. HOFFMAN (*Pro Hac Vice*)
hoffmang@dicksteinshapiro.com

3 DICKSTEIN SHAPIRO, LLP

1825 Eye Street, N.W.

4 Washington, D.C. 20006

Telephone: (202) 420-2200

5 Facsimile: (202) 420-2201

6 DANIEL J. BERGESON, SBN 105439

dbergeson@be-law.com

7 DONALD P. GAGLIARDI, SBN 138979

dgagliardi@be-law.com

8 HWAY-LING HSU, SBN 196178

hhsu@be-law.com

9 BERGESON, LLP

303 Almaden Boulevard, Suite 500

10 San Jose, CA 95110-2712

Telephone: (408) 291-6200

11 Facsimile: (408) 297-6000

12 Attorneys for Plaintiff

RICOH COMPANY, LTD.

RON E. SHULMAN, SBN 178263

rshulman@wsgr.com

TERRY KEARNEY, SBN 160054

tkearney@wsgr.com

RICHARD G. FRENKEL, SBN 204133

rfrenkel@wsgr.com

WILSON SONSINI GOODRICH & ROSATI

650 Page Mill Road

Palo Alto, CA 94304

Telephone: (650) 493-9300

Facsimile: (650) 493-6811

Attorneys for Synopsys, Inc. and Aeroflex et al.
Defendants

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 SAN JOSE DIVISION

18 IN RE RICOH COMPANY, LTD. PATENT
19 LITIGATION

Case No. 03-CV-02289 JW (HRL)

20 **JOINT STIPULATION AND [PROPOSED]**
21 **ORDER SETTING CERTAIN PRE-TRIAL**
22 **SCHEDULE DATES**
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1 Pursuant to this Court's Order of November 23, 2009, Plaintiff and Counter-
 2 Defendant Ricoh Company, Ltd. ("RicoH"), Declaratory Judgment Plaintiff Synopsys, Inc.
 3 ("Synopsys"), and Defendants Aeroflex, Inc., AMI Semiconductor, Inc., Matrox Electronics
 4 Systems, Ltd., Matrox Graphics, Inc., Matrox International Corp., Matrox Tech., Inc. and Aeroflex
 5 Colorado Springs, Inc. (the "Aeroflex et al. Defendants" or "Customer Defendants") (collectively
 6 "the Parties"), hereby jointly and collectively submit this Stipulation Setting Certain Pre-Trial
 7 Schedule Dates.

8 PROPOSED SCHEDULE

9 2. Counsel for the Parties verbally met and conferred, and exchanged email, to arrive
 10 at the proposed schedule regarding the close of discovery and a briefing schedule for the Summary
 11 Judgment Motion to be filed by Synopsys and the Customer Defendants, the Motion in Limine
 12 regarding Dirkes Thesis to be filed by Ricoh, and other pre-trial dates.

13 Event	14 Date
Summary Judgment Motion by Synopsys and Aeroflex Defendants	Jan. 8, 2010
Motion in Limine re Dirkes by Ricoh	Jan. 8, 2010
Production of updated damages information by Aeroflex Defendants	Feb. 2010
Opposition to Summary Judgment Motion and Motion in Limine	Feb. 5, 2010
Reply on Summary Judgment Motion and Motion in Limine	Feb. 19, 2010
Hearing on motions	Mar. 8, 2010
Mediation	Mar. 9, 2010
Updated expert reports by party bearing burden of proof (limited to supplemental claim construction, or damages)	June 25, 2010
Rebuttal expert reports	July 26, 2010
Mutual exchange of Trial Exhibits in electronic form	Aug. 2, 2010
Mutual exchange of proposed jury instructions (in Word)	Aug. 2, 2010
Mutual exchange of deposition designations in electronic form	Aug. 2, 2010

1	Mutual exchange of draft pretrial statements (in Word) (including all attachments not previously served, e.g., list of claims/defense to be decided, statement of relief claimed, concise statement of all relevant facts not disputable, statement of all disputed factual issues, statement whether all or part of the action may be presented upon the agreed statement of facts, statement of stipulations requested or proposed, statement of each disputed point of law concerning liability or relief, list of witnesses to be called at trial, list of evidence to be presented from interrogatories or RFAs)	Aug. 16, 2010
2	Mutual exchange of counter deposition designations in electronic form	Aug. 20, 2010
3	Completion of expert depositions re new material in expert reports	Aug. 25, 2010
4	Mutual exchange of objections to jury instructions; objections to deposition designations and counter-designations in electronic form	Aug. 27, 2009
5	First meet and confer regarding pretrial statement; jury instructions; and deposition designations	Sept. 1, 2009
6	Mutual exchange of objections to Witness Lists, Exhibit Lists (in Word)	Sept. 10, 2009
7	Ricoh to assemble and serve revised joint pretrial statement with all attachments (in Word)	Sept. 10, 2009
8	Second meet and confer re Pretrial Conference Statement, and all required attachments	Sept. 15, 2010
9	In Limine Motions Due	Sept. 17, 2010
10	Joint Pretrial Conference Statement filed (including list of claims/defense to be decided, statement of relief claimed, concise statement of all relevant facts not disputable, statement of all disputed factual issues, statement whether all or part of the action may be presented upon the agreed statement of facts, statement of stipulations requested or proposed, statement of each disputed point of law concerning liability or relief, list of witnesses to be called at trial, list of evidence to be presented, through excerpts from depositions, interrogatories or requests for admission)	Sept. 20, 2010
11	Proposed Jury Instructions	Sept. 20, 2010
12	Opposition to In Limine Motions	Sept. 27, 2010
13	Reply in support of In Limine Motions	Oct. 1, 2010
14	In Limine Binders due to Court	Oct. 4, 2010
15	Joint Witness list, Joint Exhibit List to be lodged with Chambers	Oct. 18, 2010
16	Final Pretrial Conference	Oct. 18, 2010, 11am
17	Trial	Nov. 2 - Nov 30, 2010

1 Dated: December 4, 2009

Respectfully Submitted,

2 DICKSTEIN SHAPIRO LLP

3 BERGESON, LLP

4
5 By: /s/ Kenneth W. Brothers

6 Gary M. Hoffman

7 Kenneth W. Brothers

8 Attorneys for Ricoh Company, Ltd.

9 Dated: December 4, 2009

WILSON SONSINI GOODRICH & ROSATI

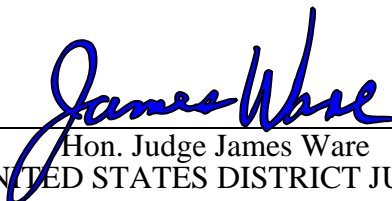
10
11 By: /s/ Ron E. Shulman

12 Ron E. Shulman

13 Attorneys for Defendants and Synopsys

1 SO ORDERED: As Stipulated above.

2 Dated: December 14, 2009

3 
Hon. Judge James Ware
UNITED STATES DISTRICT JUDGE